

Doc Date	Doc Title	Doc Source	Quote	Topic
2013.04.00	Pharmacist GFD Review Coaching Opportunities WAGMDL00256710	WAG	Cocktails identified as an Opiate or Hydrocodone, Benzodiazepine and Carisoprodol, where the Benzodiazepine and Carisoprodol (or Gabapentin) were both dispensed within 12 days plus of the Opiate dispensing date.	Timeframe
2013.08.23	CVS-MDLT1-000078008 - Email from Baker, Kelly J.	CVS	I have found instances where a patient is getting at least 2 of the cocktail drugs from the same pharmacy in the last 45 days . As I'm unable to see if that store is purchasing oxycodone, hydromorphone, etc is someone at CVS reviewing such situations if they exist. These are the kind of transactions that concern DEA.	Timeframe
2013.09.13	Pharmacist GFD Review WAGMDL00054501	WAG	Cocktails identified as an Opiate or Hydrocodone, Benzodiazepine and Soma, where the Benzodiazepine and Soma were dispensed within 12 days plus of the Opiate dispensing date.	Timeframe
2014.06.11	Market 26 GFD and Controlled Substance Trends WAGMDL00674922	WAG	Cocktails = Where the Benzodiazepine and Carisoprodol (or Gabapentin) were both dispensed within 12 days plus of the Opiate dispensing date.	Timeframe
2015.02.08	Understanding the Dangers of Dispensing Combinations of Controlled Substances CVS-NY AG-000036552	CVS	The combination of an Opioid, Benzodiazepine, and Carisoprodol should only be prescribed when there is a well documented clinical need that outweighs the potential adverse effects. Whether filling them all at once or with overlapping therapies filled at different times , pharmacists must be diligent in exercising corresponding responsibility.	Timeframe
2015.09.05	Controlled Substance Quality Assurance (CSQA) DDM00090659	DDM	The prescription presented (or a series of prescriptions over a short period of time) provides for the dispensing of an opioid pain medicine, a benzodiazepine, and a muscle relaxer.	Timeframe
2019.00.00	How to Read a Prescriber Practice Report	OARRS	Provides the number of patients... in same month	Timeframe
1994.04.13	U.S. v. Veal, 23 F.3d 985 (1994)	DOJ	In October of 1990 investigators from the United States Drug Enforcement Administration received reports from drug wholesalers that the defendant, Dennis Veal, was making inordinately large purchases of Doriden and Tylenol 4 . Doriden, a sleeping medication, and Tylenol 4, a pain medication containing codeine, are Schedule III controlled substances. These drugs have a heroin-like effect when ingested in combination. The combination is commonly referred to in the illegal drug market as " fours and doors ."	Two Drugs as cocktail
2010.10.27	East Main Street Pharmacy; Affirmance of Suspension Order	DEA	More specifically, the Immediate Suspension Order alleged that on October 2, 2009, L.D.C., a resident of Portsmouth, Ohio obtained from a physician practicing in Wheelersburg, Ohio, prescriptions for 90 tablets of oxycodone 30 mg. and 60 tablets of carisoprodol (a non- controlled but highly abused drug which metabolizes into meprobamate, a Schedule IV depressant), and that she then travelled "approximately 100 miles from Wheelersburg to Columbus" and filled the prescriptions at Respondent.	Two Drugs as cocktail

2010.10.27	East Main Street Pharmacy; Affirmance of Suspension Order	DEA	For example, on April 25, 2008, A.B., a resident of Denton, Kentucky (143 miles from Respondent), filled prescriptions for 180 oxycodone 30 mg., 120 oxycodone 15 mg., and 90 alprazolam 2 mg.; on July 23, 2008, C.W., a resident of Ashland, Kentucky (123 miles from Respondent), filled prescriptions for 240 oxycodone 30 mg., 60 oxycodone 15 mg., and also 60 alprazolam 2 mg.; and on August 11, 2008, N.W., a resident of Flatwoods, Kentucky (118 miles from Respondent), filled prescriptions for 240 oxycodone 30 mg., 90 oxycodone 15 mg., and also 60 alprazolam 2 mg. GX 10, at 1-2. Moreover, on August 25, 2008, C.L. filled prescriptions for 90 diazepam 10 mg. and 60 alprazolam 2 mg.\28\ Id.	Two Drugs as cocktail
2011.03.07	DEA Update HDMA 2011 Distribution Management Conference	DEA	A 'cocktail' of oxycoodone and alaprazolam (Xanax)	Two Drugs as cocktail
2012.10.12	Holiday CVS, L.L.C., d/b/a CVS/ Pharmacy Nos. 219 and 5195; Decision and Order	DOJ	Regarding these prescriptions, Professor Doering Expert testified that from the perspective of "a clinical pharmacist * * * that combination of drugs is * * * a red flag because [a]lprazolam and oxycodone are commonly diverted to nonmedical use." Tr. 784. As for the two oxycodone prescriptions each person obtained, Professor Doering explained that while "one might speculate that the reason for that is that pain can vary throughout the day and it may be that the individual is suggested to take the 15 [mg tablets] when the pain is not so great and 30 [mg tablets] when it is so great," the "30 milligram tablets are scored right down the middle, and it's quite easy to break them in half." Id. Professor Doering thus explained that prescribing both fifteen and thirty milligram strengths of the drug "just doesn't make any sense."	Two Drugs as cocktail
2012.10.12	Holiday CVS, L.L.C., d/b/a CVS/ Pharmacy Nos. 219 and 5195; Decision and Order	DOJ	Contrary to this contention, DI Langston testified that the combination of oxycodone and Xanax (the brand name for alprazolam) was a red flag of diversion for at least "[a] couple of years ago."	Two Drugs as cocktail
2012.11.26	Order to Show Cause WAGMDL00387708	WAG	individuals presenting prescriptions for combinations of controlled substances known to be highly abused, such as oxycodone and benzodiazepines ;	Two Drugs as cocktail
2012.11.26	Order to Show Cause WAGMDL00387708	WAG	filled eleven prescriptions for oxycodone and alprazolam cocktails	Two Drugs as cocktail
2012.12.00	Drug Trends, Indianapolis, Indiana	DEA	A 'cocktail' of oxycoodone and alaprazolam (Xanax)	Two Drugs as cocktail
2014.05.21	PAIN CLINIC OWNER SENTENCED TO 14 YEARS IN PRISON AND ORDERED TO FORFEIT \$6.3 MILLION IN PROFITS	DOJ	clinic customers would receive excessive amounts of "cocktails" of controlled substances including diazepam, hydrocodone, oxycodone and alprazalam.	Two Drugs as cocktail
2014.09.08	Vanelli Email re: Store Cocktail Details Tab CVS-MDLT1-000029477	CVS	when hydro is the most common cocktail combined with the flagged drug (as an example; Alprazolam).	Two Drugs as cocktail
2016.08.00	DRUGS, DRUGS, & MORE DRUGS Powerpoint	DEA	Prescribers using the same drug regimen for every patient (hydrocodone / apap & carisoprodol).	Two Drugs as cocktail
2016.08.31	FDA warns about serious risks and death when combining opioid pain or cough medicines with benzodiazepines; requires its strongest warning	FDA	A U.S. Food and Drug Administration (FDA) review has found that the growing combined use of opioid medicines with benzodiazepines or other drugs that depress the central nervous system (CNS) has resulted in serious side effects, including slowed or difficult breathing and deaths.	Two Drugs as cocktail

2016.08.31	FDA warns about serious risks and death when combining opioid pain or cough medicines with benzodiazepines; requires its strongest warning	FDA	FDA conducted two studies that showed an increasing trend in concomitant dispensing of opioid analgesics and benzodiazepines , and an increasing frequency of combined benzodiazepine and prescription opioid misuse, abuse, and overdose, as measured by national emergency department (ED) visit and overdose death rates (from prescribed or greater than prescribed doses).	Two Drugs as cocktail
2018.01.29	Jones Total Health Care Pharmacy, LLC v. DEA, 881 F.3d 823 (2018)	DOJ	prescriptions for drug "cocktails," known for their abuse potential, such as oxycodone and Xanax ;	Two Drugs as cocktail
2018.02.23	Pharmacy Compliance DDM00455410	DDM	Prescribes "drug cocktail" - Oxycodone, hydrocodone, alprazolam, etc.	Two Drugs as cocktail
2018.03.00	Benzodiazepines and Opioids	NIH	More than 30 percent of overdoses involving opioids also involve benzodiazepines , a type of prescription sedative commonly prescribed for anxiety or to help with insomnia.	Two Drugs as cocktail
2018.08.31	CDC GUIDELINE FOR PRESCRIBING OPIOIDS FOR CHRONIC PAIN	CDC	AVOID CONCURRENT OPIOID AND BENZODIAZEPINE PRESCRIBING Clinicians should avoid prescribing opioid pain medication and benzodiazepines concurrently whenever possible.	Two Drugs as cocktail
2019.09.00	Review of the Drug Enforcement Administration's Regulatory and Enforcement Efforts to Control the Diversion of Opioids	OIG-DOJ	DEA officials and staff told us that benzodiazepines , while not opioids, are often used in conjunction with opioids and can produce a particularly lethal drug cocktail often referred to as the "holy trinity."	Two Drugs as cocktail
2019.09.20	PHARMACY DOCTORS ENTERPRISES, INC., d.b.a. Zion Clinic Pharmacy, Petitioner, v. DRUG ENFORCEMENT ADMINISTRATION, Respondent. No. 18-11168	DOJ	several prescriptions for two drugs that, taken together, would make a "cocktail" for recreational rather than medical use	Two Drugs as cocktail
2019.09.20	PHARMACY DOCTORS ENTERPRISES, INC., d.b.a. Zion Clinic Pharmacy, Petitioner, v. DRUG ENFORCEMENT ADMINISTRATION, Respondent. No. 18-11168	DOJ	Regarding the allegation that Pharmacy Doctors filled prescriptions that would enable customers to make drug cocktails for non-medical uses, Fisher thought that, to be a cocktail, a third drug was required. Nevertheless, he admitted that Pharmacy Doctors would not know if customers obtained the third drug from another pharmacy because it lacked access to Florida's electronic drug-monitoring system.	Two Drugs as cocktail
2009.03.10	Health & Wellness Practice Compliance WMT_MDL_000010536	Wal-Mart	Patients receiving trinity (Opiate/Benzo/Muscle Relaxant)	Three Drugs as cocktail
2010.10.27	East Main Street Pharmacy; Affirmance of Suspension Order	DEA	"large quantity prescriptions" for a benzodiazepine, two narcotic pain medications, and Soma,	Three Drugs as cocktail
2010.10.27	East Main Street Pharmacy; Affirmance of Suspension Order	DEA	were not receiving individualized therapy, for 75% of these patients received the same four drug 'cocktail,'	Three Drugs as cocktail
2010.10.27	East Main Street Pharmacy; Affirmance of Suspension Order	DEA	Volkman frequently prescribed large quantities of multiple controlled substances including narcotics containing oxycodone \7\ and hydrocodone,\8\ benzodiazepines such as Xanax (alprazolam) and Valium (diazepam),\9\ as well as the currently non-controlled drug Soma (carisoprodol) which is nonetheless popular with drug abusers, without a legitimate medical purpose and outside of the usual course of professional practice.	Three Drugs as cocktail

2012.10.12	Holiday CVS, L.L.C., d/b/a CVS/ Pharmacy Nos. 219 and 5195; Decision and Order	DOJ	In any event, even before many of the dispensings which are at issue here, this Agency had published several decisions which discussed the diversion and abuse of oxycodone, as well as drug cocktails which included oxycodone, alprazolam, and carisoprodol. See Paul J. Volkman, 73 FR 30,630 (2008) (discussing drug cocktails issued by physician for oxycodone, benzodiazepines and carisoprodol, expert testimony of abuse potential of these drugs, and red flag of patient travelling long distance to fill prescriptions); see also East Main Street Pharmacy, 75 FR 66,149 (Oct. 27, 2010) (discussing abuse of oxycodone, alprazolam, and carisoprodol and red flag of patients traveling long distances to fill prescriptions); Your Druggist Pharmacy, 73 FR 75,774, 75,775 n.1. (2008) (noting that “[w]hile carisoprodol [was] not controlled under Federal law, it is controlled under various state laws and is highly popular with drug abusers, especially when taken as part of a drug cocktail that includes an opiate and a benzodiazepine”).	Three Drugs as cocktail
2012.10.12	Holiday CVS, L.L.C., d/b/a CVS/ Pharmacy Nos. 219 and 5195; Decision and Order	DOJ	As an example of a red flag of diversion which would have been discussed during these DEA outreach programs, DI Langston identified “a lot of prescriptions coming in for oxycodone, 30 milligrams (mg), oxycodone, 15 [mg]; Xanax 5 [alprazolam] two [mg].”	Three Drugs as cocktail
2012.10.12	Gov't Affairs / Asset Protection Rite_Aid_OMDL_0029789	Rite Aid	THE TRINITY/HOLY TRINITY - Is there a legitimate medical reason for a patient to be prescribed an opiate, a benzodiazepine and carisoprodol?	Three Drugs as cocktail
2012.11.26	Order to Show Cause WAGMDL00387708	WAG	In addition, Walgreens 03629 dispensed controlled substances, primarily in suspicious cocktail combinations of oxycodone, alprazolam and carisoprodol, to patients of at least twenty (20) practitioners who were subjected to disciplinary action for dispensing illegitimate prescriptions for controlled substances.	Three Drugs as cocktail
2013.01.10	NATIONAL ASSOCIATION OF CHAIN DRUG STORES DEA Compliance Working Group January 10, 2013 Meeting Summary CAH_MDL2804_02933683	WAG	"75% of the patients received the same four drug cocktail which included a benzodiazepine, two narcotic pain killers and Soma."	Three Drugs as cocktail
2013.04.00	Pharmacist GFD Review Coaching Opportunities WAGMDL00256710	WAG	Cocktails such as an Opiate or Hydrocodone, Benzodiazepine and Carisoprodol	Three Drugs as cocktail
2015.03.10	NexGen Automated Red Flag Documentation Process for High Alert Controlled Substances Rite_Aid_OMDL_0044351	Rite-Aid	Only prescriptions for controlled substances in profile , or only fills for a combination of products commonly known as the "trinity" (oxycodone, alprazolam and carisoprodol or any combination of drugs from these three drug classes).	Three Drugs as cocktail
2015.09.05	Controlled Substance Quality Assurance (CSQA) DDM00090659	DDM	Combination of drugs that constitute the "trilogy" or "triple" (narcotic, benzodiazepine, muscle relaxer)	Three Drugs as cocktail

2016.01.14	Prescribing Guidelines for Pennsylvania - Opioid Dispensing Guidelines HBC MDL00008710	The Pennsylvania Pharmacists Association	Prescriber writes for the same "cocktail" or combination of drugs. • Opioid + Muscle Relaxant + Benzodiazepine	Three Drugs as cocktail
2016.08.00	DRUGS, DRUGS, & MORE DRUGS Powerpoint	DEA	Is there any legitimate reason to prescribe/dispense an opiate, a benzodiazepine, and carisoprodol to several patients from one physician? <u>Not if you know their indications and metabolism, there isn't!</u>	Three Drugs as cocktail
2016.11.00	Pharmacy Professional Practice CVS-INDAG-00016506	CVS	I mentioned before cocktail, especially in the combination of an opioid, a benzo and soma. In reviewing patient profiles, I still see stores filling these combinations for customers. Pharmacists need to understand that there is little reason that this combination should need to be prescribed together. Store teams need to question this combination and not fill, just because the customer has been on this therapy for ages. Too often we are seeing this concerning combination with little to no documentation in the patient's profile to justify the fills. If this combination is to be filled, we would expect to see it in the lowest dose and frequency possible with clear documentation for the need. Strength of concern- Is the store filling a lot of Oxycodone 30mg or Alprazolam 2mg. High doses in these frequently diverted medications need clear diagnoses documented in the profile. And the pharmacist needs to determine does the diagnosis fit the therapy?	Three Drugs as cocktail
2016.11.00	Pharmacy Professional Practice CVS-INDAG-00016506	CVS	Cocktail- routinely prescribes the same combination to most patients, prescribes combinations that DEA has said have high potential for abuse Trinity: Benzo, soma, hydrocodone Holy Trinity: Benzo, soma, oxycodone	Three Drugs as cocktail
2017.02.09	POM 1311 Practice Compliance Corresponding Responsibility - Proper Prescriber Patient Relationship WMT_MDL_000042987	Wal-Mart	Prescriptions presented represent a "cocktail" of commonly abused drugs or are presented in a combination that can cause medical complications. (i.e. an opioid, a benzodiazepine, and a muscle relaxant) This is often referred to as the "trinity" or "holy trinity."	Three Drugs as cocktail
2017.06.16	Non-Cancer Chronic Pain Rite_Aid_OMDL_0046051	Rite Aid	"The Trinity" includes: opioid (usually hydrocodone) + benzodiazepine + carisoprodol.	Three Drugs as cocktail
2016.08.31	FDA warns about serious risks and death when combining opioid pain or cough medicines with benzodiazepines; requires its strongest warning	FDA	Recent studies in the literature show that concomitant use of opioid analgesics and CNS depressants other than benzodiazepines, including alcohol, is also associated with serious adverse events.	Other Drugs as Cocktail
2011.09.17	Combating Pharmaceutical Diversion - Pharmacy Diversion Awareness Conference Rite_Aid_OMDL_0025594	Rite Aid	"Cocktail" or "Holy Trinity" - Hydrocodone, Soma / Carisoprodal, Alprazolam / Xanax	Multiple Drugs as Cocktail
2011.09.17	Combating Pharmaceutical Diversion - Pharmacy Diversion Awareness Conference Rite_Aid_OMDL_0025594	Rite Aid	Preferred Prescriptions- 'Holy Trinity' - Schedule II and III narcotics (OxyContin, Vicodin) - Schedule IV Benzodiazepines (Xanax, Valium) - Non-Controlled Muscle Relaxants/Sedative (Some) - Non-Controlled Opioid Analgesic-Tramadol (Utram) substituted for schedule II/III narcotic	Multiple Drugs as Cocktail

2012.08.00	Store Statistics for SOM order review June - August 2012	CVS	cocktails for opioids are methadone, muscle relaxants, stimulants and benzodiazepines; cocktails for benzodiazepines are opioids; no cocktail metric is calculated for other drug classes)	Multiple Drugs as cocktail
2012.10.12	Holiday CVS, L.L.C., d/b/a CVS/ Pharmacy Nos. 219 and 5195; Decision and Order	DOJ	As to the red flags 45 of diversion, GS Lane mentioned: (1) "doctors * * * writing * * * the same cocktail of drugs which was oxycodone 30 milligrams, oxycodone 15 [mg], generic Xanax 2 [mg], Soma, and * * * lately * * * a noncontrolled substance like flexural," Tr. 114, 116.; (2) doctors without a specialty in pain management writing "large quantities" of prescriptions, Tr. 115; (3) doctors giving the same diagnosis code, "usually L-4, L-5 lower back pain," Tr. 115; (4) patients between the ages of 25 and 40 with cash, Tr. 117; and (5) evidence of doctor shopping,46 Tr. 118. GS Lane also identified "sponsor" arrangements in which "people from * * * mostly * * * the mountain states * * * come down in buses and vans * * * and drive to the pharmacy" to fill oxycodone prescriptions.	Multiple Drugs as cocktail
2012.11.26	Order to Show Cause WAGMDL00387708	WAG	filled a prescription for 150 dosage units of oxycodone 30mg issued to JAM... filled prescriptions for 180 dosage units of oxycodone 30mg, 90 dosage units of hydromorphone 8mg (Schedule II controlled substance) and 60 dosage units of alprazolam 2mg issued to JAM... filled prescriptions issued to JAM for 90 dosage units of hydromorphone 8mg and 60 dosage units of alprazolam 2mg... filled a prescription issued to JAM for 90 dosage units of diazepam 10mg (Schedule IV controlled substance).	Multiple Drugs as cocktail
2013.01.10	NATIONAL ASSOCIATION OF CHAIN DRUG STORES DEA Compliance Working Group January 10, 2013 Meeting Summary CAH_MDL2804_02933683	WAG	Example: Patients "received 168 tablets of oxycodone 30 mg, 56 tablets of oxycodone 15 mg, and 56 tablets of alprazolam 2 mg" ... Example: "the combination of these two narcotics, a benzodiazepine, and a muscle relaxant...Notwithstanding this, there is ample evidence showing that Respondent repeatedly dispensed - cocktail prescriptions for oxycodone, -- hydrocodone, alprazolam, and carisoprodol."	Multiple Drugs as cocktail
2015.03.10	NexGen Automated Red Flag Documentation Process for High Alert Controlled Substances Rite_Aid_OMDL_0044351	Rite-Aid	The prescriber routinely prescribes the same "cocktail" or combination of drugs for pain treatment to most or all of his/her patients , particu larly where DEA and other authorities have identified the combination as potentially abused (e.g., oxycodone , alprazolam and carisoprodol or any combination of drugs from these three drug classes).	Multiple Drugs as cocktail
2016.08.31	FDA warns about serious risks and death when combining opioid pain or cough medicines with benzodiazepines; requires its strongest warning	FDA	List of Benzodiazepines and Other CNS Depressants <See doc for complete list>	Multiple Drugs as cocktail
2019.00.00	How to Read a Prescriber Practice Report	OARRS	There are certain dangers to concurrently prescribing opioids and benzodiazepines. The addition of carisoprodol not only further increases the risk of overdose, this combination of drugs is a frequently abused cocktail commonly known as the "trinity," or the "holy trinity."	Multiple Drugs as cocktail
2010.10.27	East Main Street Pharmacy; Affirmance of Suspension Order	DEA	Dr. Sullivan noted an instance where a physician had written for a combination of a narcotic, a benzodiazepine, a muscle relaxant, and a sleeping pill; there were "similar doses for everybody, [with] no individualization of therapy"; and "maximum doses for everyone."	Four Drugs as cocktail

2010.10.27	East Main Street Pharmacy; Affirmance of Suspension Order	DEA	In his testimony, Dr. Sullivan explained that pharmacists refer to the combination of "the benzodiazepine, the narcotic * * * pain killer, and the sleeping pill" as "[t]he triple," and that when Soma (carisoprodol) is added, the combination is known as the "homerun."	Four Drugs as cocktail
2012.10.12	Holiday CVS, L.L.C., d/b/a CVS/Pharmacy Nos. 219 and 5195; Decision and Order	DOJ	At the meeting, the parties discussed a pharmacist's corresponding responsibility "at length." Tr. 54. The discussion topics included the pill mill problem in Florida; some recent arrests and other DEA enforcement activity; increased publicity; the oxycodone crisis; and the combination of prescriptions for oxycodone 30 mg, oxycodone 15 mg, Alprazolam 2 mg, and a fourth "filler" 8 drug, which DEA identified as an indicator of diversion	Four Drugs as cocktail